

REMARKS

Claims 1-23 remain in the application. The second occurrence of claim 16 and claims 17-22 have been renumbered as 17-23. No new matter has been added.

Claim Rejections - 35 USC 103

Claims 1-23 were rejected under 35 USC 103 as being obvious over Chen et al. in view of Safadi. However, to establish a *prima facie* case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. (See M.P.E.P. Section 2143).

No Motivation to Combine

In the present case, none of these criteria have been met in the Office Action. First, there is no suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify Chen et al. or combine it with Safadi. The present invention, like Chen et al., is drawn to the integration of communication service providers. However, Safadi is drawn to the non-analogous (and, in this case, irrelevant) art of Television, as illustrated by its classification in class 348.

Although Safadi uses terms such as “network,” “gateway,” “communicate,” “service,” and “provider,” it has nothing to do with the integration of *communication service providers*. The VIP’s (video information providers) are not *communication service providers*, but rather *content providers for television services*. As such, the statement in the Office Action that “Applicant will appreciate that Safadi’s VIP’s (video information providers) are the telecom. service providers” is entirely erroneous and without merit.

Indeed, the stated reason to combine Safadi with Chen et al., to provide “a system with enhanced capability and extended functionality” makes no sense because it is unclear how adding a gateway for video information from television content providers would provide any enhancement to communication service provider integration to one of skill in the art. The only reason to combine Safadi with Chen et al. is hindsight reasoning based on Safadi’s inclusion of a

high number of claim terms in its text. A large number of text-search hits in an irrelevant reference is NOT a valid reason to combine references.

No Reasonable Expectation of Success

Since it is unclear how the video information gateway from a cable TV system of Safadi could possibly “transfer information to and receive information from telecommunication service providers” disclosed in Chen et al., there would be no reasonable expectation that a combination of the features would successfully produce Applicants’ claimed invention.

All Claim Limitations Not Shown

The Office Action admits that Chen et al. do not disclose the claimed gateway. As discussed above, Safadi also fails to disclose or fairly suggest the claimed gateway.

Additionally, as discussed in the corresponding PCT application, Applicants submit that the cited prior art to Chen et al. does not disclose or fairly suggest “a pre-order management component comprising instructions for retrieving customer service records from telecommunication service providers and parsing said customer service records into reports containing equivalent ICP services” as required by independent claims 1, 8, and 15.

Although the Office Action states that Chen et al. “would have codes or instructions for obtaining (retrieving) customer records” and cites to the customer record of fig. 6 and the customer profile of fig. A, Applicants submit that Chen et al. does not disclose or fairly suggest the claimed limitation.

The claimed limitation is more specific than having “codes or instructions for obtaining (retrieving) customer records.” The claim limitation is to instructions for retrieving specific records, customer *service* records, from a specific location, the customer’s telecommunication service providers. The prior art to Chen et al. nowhere suggests that the customer record or profile be the customer *service* record from their current telecommunication providers.

The claim limitation further requires “instructions for ...parsing said customer service records into reports containing equivalent ICP services.” The delegation of internal subprocesses of Chen et al., as cited in the Office Action, has nothing to do with parsing of prior/existing services into equivalent services; it is merely concerned with message/data handling (i.e., “When messages and data from the client are received...”). Further, since Chen et al. deals directly with clients, it is clear that it is not concerned with automating sales proposals, as is the present

invention, and therefore Chen et al. has no reason to either obtain the CSRs or parse them into equivalent ICP services.

As disclosed in the specification at page 4, lines 10-17:

“As the CSR often identifies both ILEC provided services as well as services of competing ICPs and resellers, it is convenient for ICPs and resellers to retrieve a customer service CSR in preparing a sales proposal. Following retrieval, the CSR is interpreted and ICP competing service offerings are identified. The sales proposal is based upon this analysis and a final proposal is presented to the customer. Up to now, the CSR has been printed then manually compared to an ICP's service offerings. This manual process is labor intensive and prone to errors. As a result, a method of automating the sales proposal function based on CSR is needed.”

Indeed, neither Chen et al. nor any of the other cited prior art teaches or fairly suggests automating the sales proposal function based on CSR by “a pre-order management component comprising instructions for retrieving customer service records from telecommunication service providers and parsing said customer service records into reports containing equivalent ICP services” as presently claimed.

In view of the above arguments, Applicants respectfully submit that claims 1-23 are novel and non-obvious over the cited prior art.

Conclusion

For the reasons cited above, Applicants submit that claims 1-23 are in condition for allowance and requests reconsideration of the application. If there remain any issues that may be disposed of via a telephonic interview, the Examiner is kindly invited to contact the undersigned at the local exchange given below.

Respectfully submitted,



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